

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA and  
THE STATE OF CALIFORNIA,  
EX REL. STEVEN HIGGINS,

Plaintiffs,

v.

BOSTON SCIENTIFIC  
CORPORATION  
Defendant.

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Civil Action No. 11-cv-02453-JNE-TNL

**JOINT NOTICE IMPLEMENTING SETTLEMENT**

Relator Steven Higgins (“Relator”) and Defendant Boston Scientific Corporation (“BSC”) (collectively, the “Parties”) have entered into an agreement to resolve this case. As part of that agreement, Relator and BSC have agreed not to seek fees or costs from each other. To implement the agreement:

- Relator hereby releases BSC from any obligations ordered by Magistrate Judge Leung’s September 3, 2021 Order (the “Fee Order”) (Dkt. 590) relating to his Order granting, in part, Relator’s Motion for Sanctions (Dkt. 354); and
- BSC hereby withdraws its Bill of Costs (Dkt. 593).

Respectfully submitted,

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By: /s/ Daniel R. Miller

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**CERTIFICATE OF SERVICE**

I certify that on October 4, 2021, I caused the foregoing document to be filed via the Court's CM/ECF electronic filing system, which will provide an electronic copy to all counsel of record.

By: /s/ Daniel R. Miller